

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

U.S. DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK
DOCUMENT
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Cortec Corporation, a Minnesota
corporation,

Civil Action No. 07 Civ. 6094 (CM)

Plaintiff,

v.

Erste Bank der oesterreichischen Sparkassen
AG (Erste Bank), an Austrian corporation.

**STIPULATION TO EXTEND TIME IN
WHICH PLAINTIFF MUST RESPOND
TO DEFENDANT'S MOTION TO
DISMISS**

Defendant.

X

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned,
attorneys for Plaintiff Cortec Corporation and Defendant Erste Bank der oesterreichischen
Sparkassen AG in the above entitled action, as follows:

1. On June 28, 2007 Plaintiff served Defendant with the summons and complaint.
2. Defendant requested two months to answer or otherwise respond to the complaint.
3. Plaintiff consented to an extension of time to answer or otherwise respond to the
complaint until August 31, 2007.
4. On August 31, 2007 Defendant electronically filed its motion to dismiss the
complaint, consisting of a 25-page memorandum of law and hundreds of pages of exhibits.
5. The parties respectfully request that this Court grant Plaintiff an extension of time
to submit its opposition papers to the motion to dismiss until October 31, 2007 and grant
Defendants until November 13, 2007, to submit any reply papers.

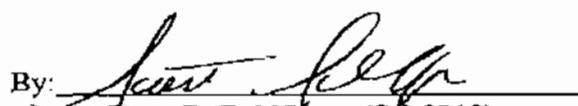
6. The parties further request that this Court adjourn the discovery conference

January 4, 2008 at 10 Am.
scheduled for September 14, 2007 to a date convenient to the Court after decision on the motion
to dismiss.

7. No previous request for an extension of time has been made.

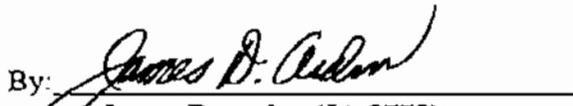
Dated: New York, New York
September 7, 2007

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SO ORDERED:

Dated: New York, New York
September , 2007


The Honorable Colleen McMahon
United States District Judge